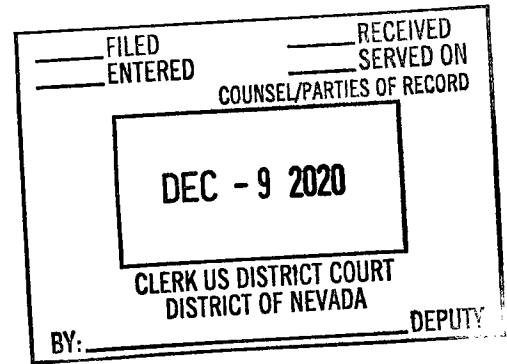


PAUL SCOTT NELSON  
 Name H.D.S.P.  
P.O. BOX 650  
INDIAN SPRINGS, NEV.  
89070

82571  
 Prison Number



UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

\*\*\*

PAUL SCOTT NELSON,  
 Plaintiff

vs.

DANIELS, DIR. N.D.O.C.,  
JOHNSON, WARDEN, H.D.,  
ROBERT FAULKNER, D.O.N.,  
DR. WULFF,  
DR. BRYAN,  
 Defendant(s).

**2:20-cv-02224-JAD-NJK**

CIVIL RIGHTS COMPLAINT  
 PURSUANT TO  
 42 U.S.C. § 1983

**A. JURISDICTION**

1) This complaint alleges that the civil rights of Plaintiff, PAUL SCOTT NELSON,  
 (print plaintiff's name)

who presently resides at H.D.S.P. (HIGH DESERT), were violated by

the actions of the below-named individuals that were directed against Plaintiff at

HIGH DESERT STATE PRISON on the following dates:  
 (institution/city where violation occurred)

12-13-2018, \_\_\_\_\_, and \_\_\_\_\_.  
 (Claim 1) (Claim 2) (Claim 3)

Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants

- 2) Defendant DANIELS, \_\_\_\_\_ resides at CONFIDENTIAL, and is  
(full name of first defendant) (address of first defendant)  
employed as DIRECTOR, N.D.O.C.. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: DIRECTOR OF THE NEVADA DIRECTOR OF  
CORRECTIONS / AT ALL TIMES RELEVANT

- 3) Defendant JOHNSON, \_\_\_\_\_ resides at CONFIDENTIAL, and is  
employed as WARDEN, H.D.S.P.. This defendant is sued in his/her  
☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: WARDEN OF HIGH DESERT STATE PRISON /  
AT ALL TIMES RELEVANT

- 4) Defendant \_\_\_\_\_, FAULKNER resides at CONFIDENTIAL, and is  
employed as DIRECTOR OF NURSING. This defendant is sued in his/her  
☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting

under color of law: DIRECTOR OF NURSING / HIGH DESERT  
MEDICAL DEPARTMENT AT ALL TIMES RELEVANT

- 5) Defendant DR. Wulff, resides at CONFIDENTIAL, and is employed as DOCTOR H.O.S.P.. This defendant is sued in his/her ☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: A DOCTOR WITHIN THE HAZA DESERT STATE PRISON MEDICAL DEPARTMENT/AT ALL TIMES RELEVANT
- 6) Defendant DR. BR resides at CONFIDENTIAL, and is employed as DOCTOR H.O.S.P.. This defendant is sued in his/her ☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: DOCTOR WITHIN HAZA DESERT STATE PRISON MEDICAL DEPARTMENT/AT ALL TIMES RELEVANT
- 7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.  
ANY AND ALL OTHER AUTHORITY, LAWS, TREATISE, STATUTES VESTED IN THIS COURT'S JURISDICTION

#### B. NATURE OF THE CASE

- 8) Briefly state the background of your case.  
ON THE DATE OF: 12-13-18, WHILE WORKING WITHIN H.O.S.P., I SUSTAINED AN INJURY, WHICH I BELIEVED TO BE AN 'ABDOMINAL HERNIA'. THE H.O.S.P. MEDICAL DEPARTMENT HAS FAILED OR REFUSED TO PROVIDE PROPER AND ADEQUATE MEDICAL CARE, IN VIOLATION OF 8TH AMENDMENT OF THE U.S. CONSTITUTION; AND 1ST AMENDMENT OF U.S. CONST.

## C. CAUSE(S) OF ACTION

## CLAIM 1

The following civil rights have been violated: EIGHTH AMENDMENT OF THE UNITED STATES CONSTITUTION: "DELIBERATE INDIFFERENCE AND 'CRUEL AND USUAL PUNISHMENT'; AND FIRST AMENDMENT U.S. CONST.

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

1. ON THE DATE OF 12-13-2018, I WAS WORKING IN THE HIGH DESERT STATE PRISON BOILER ROOM.
2. THE HIGH DESERT STATE PRISON (H.D.S.P.) BOILER ROOM THAT I (PLAINTIFF); WAS WORKING IN, IS BEHIND THE H.D.S.P. CULINARY.
3. PLAINTIFF STATES: AS I WAS MOVING A STEEL PANEL APPROXIMATELY 8 FEET BY THREE FEET (3) IN SIZE; THE PANEL BEGAN TO SLIP/OR SEPARATE FROM THE INSULATION ON ONE SIDE. WHEN THE INSULATION STARTED TO PEEL AWAY, THE PANEL BECAME VERY AWKWARD AND SHEETED THE LEVERAGE ON ME, I SLUMBERED AND THAT'S WHEN I FELT THE INITIAL "SHARP PAIN."
4. I REPORTED THE PAIN TO MY IMMEDIATE FREE-STAFF SUPERVISOR; AND THE UNIT OFFICER. THESE TWO PRISON EMPLOYEES INFORMED ME THAT I SHOULD REPORT THE INCIDENT TO THE HIGH DESERT STATE PRISON MEDICAL DEPARTMENT.

5. PLAINTIFF, THEREAFTER WENT A 'MEDICAL RITE' TO THE H.D.S.P. MEDICAL DEPARTMENT.

6. DURING THE FIVE MONTH PERIOD OF TIME FROM THE DATE PLAINTIFF INFORMED THE H.D.S.P. MEDICAL DEPARTMENT OF THE 'HERNIA' INJURY; PLAINTIFF SUFFERED FROM A SERIES OF PAIN SPELLS.

7. PLAINTIFF STATES, WHEN HE FINALLY SAW THE MEDICAL SPECIALISTS WITHIN THE H.D.S.P. MEDICAL DEPARTMENT, THE SWELL IN THE WALL OF PLAINTIFF'S ABDOMEN HAD INCREASED TREMENDOUSLY, AND BY THAT TIME, EVERY TIME PLAINTIFF COUGHED, FARTED, USED THE TOILET #1 OR #2, SNEEZED OR WORKED FOR PROLONGED PERIODS OF TIME PETTICOATS WOULD APPEAR IN PLAINTIFF'S ABDOMEN WALL.

8. THE MEDICAL PRACTITIONER IN THE H.D.S.P. WHO I SHOWED THE HERNIA TO; GAVE ME A 'HERNIA BELT'; AND SAID HAVE A NICE DAY.

9. I INFORMED THE DOCTOR THAT I WANTED TO BE SEEN BY AN OUTSIDE SPECIALIST FOR POSSIBLE SURGERY.

THIS SPECIALIST REFUSED TO MAKE A NOTE OF MY REQUEST; OR REFER ME TO AN OUTSIDE AGENCY.

10. SINCE THE INJURY, THE H.D.S.P. MEDICAL DEPARTMENT HAS FAILED OR REFUSED TO ALLOW ME TO RECEIVE ANY FURTHER TREATMENT, EVEN THOUGH

I HAVE EXPLAINED THAT I REMAIN IN CONSTANT PAIN; AND THE HERNIA HAS NOT GONE AWAY; AND HAS IN FACT GOTTEN BIGGER.

11. IT IS FOR THIS REASON, I BELIEVE THAT THE HIGH DEBT STATE PRISON MEDICAL DEPARTMENT; AND ITS DOCTORS AND MEDICAL NURSES HAVE ACTED 'DELIBERATELY INDIFFERENT TO MY SERIOUS MEDICAL NEEDS.'

12. THE 'HERNIA BELT' DOES NOT HELP PLAINTIFF VERY MUCH. PLAINTIFF HAS TO HOLD THE BELT TO KEEP THE HERNIA IN PLACE AT ALL TIMES; OR PLAINTIFF CAN FEEL SOMETHING 'POPPING' IN AND OUT OF MY ABDOMIN WALL.

13. PLAINTIFF HAS EXPLAINED THIS TO: DEFENDANTS DR. WULF, DR. BRYANT, D.O.N. FAULKNER; WARDEN JOHNSON; AND DIRECTOR DANIELS; THROUGH A SERIES OF: 'INTERDEPARTMENTAL MAIL' (LETTERS). IN.

14. THE REASON PLAINTIFF SENT 'INTERDEPARTMENTAL LETTERS' (MAIL) TO THE NAMED DEFENDANTS; WAS FOR THE PURPOSE OF INSURING THEY WERE AWARE OF MY SERIOUS MEDICAL NEEDS: 'PERSONALLY' ~~AND~~ 'OFFICIALLY'; SINCE H.D.S.P. AND THE N.D.O.C. HAS IMPLEMENTED ADMINISTRATIVE REGULATIONS, WHICH STATE THAT AN INMATE CAN NOT GRAB 'OUTSIDE PROVIDERS'. AND PLAINTIFF DIDN'T WANT HIS MEDICAL NEEDS TO FALL 'BETWEEN THE CRACKS'; SINCE INMATE ORDINANCES DON'T

ALWAYS REACH THE PEOPLE WHO ARE RESPONSIBLE FOR THE ALG DECISIONS.

15. PLAINTIFF BELIEVES ANY DOCTOR WITHIN THE NEVADA DEPARTMENT OF CORRECTIONS, WHICH WORKS TO CIRCUMVENT HIS ABILITY TO GRIEVE, OR CHALLENGE THE MEDICAL PROVIDERS ACTIONS, WITHIN H.D.S.P. WORK TOO; AND HAVE IN FACT VIOLATED HIS 1ST AMENDMENT RIGHT TO 'ADDRESS GRIEVANCES' IN VIOLATION OF THE UNITED STATES CONSTITUTION; AND 'CHILLS' HIS ABILITY TO RECEIVE THE PROPER AND ADEQUATE MEDICAL TREATMENT OF WHICH HE IS ENTITLED.

16. ~~DEFENDANT~~ SUBMITS DEFENDANT, DR. BRYAN IS LIABLE BECAUSE HE PRESCRIBES PAIN MEDICATION WITHIN H.D.S.P.; AND HAS FAILED OR REFUSED TO DO SO FOR PLAINTIFF'S PAIN AND SUFFERING.

17. ~~DEFENDANT~~ SUBMITS DEFENDANT, DR. WULF IS LIABLE, BECAUSE HE IS RESPONSIBLE FOR REFERRALS OF INMATES FOR MRI'S AND OUTSIDE TREATMENT FOR SPECIALIZED CARE.

18. ~~DEFENDANT~~ FAULKNER IS LIABLE BECAUSE HE HAS FAILED, OR REFUSED TO ENSURE PROPER COORDINATION OF PLAINTIFF'S MEDICAL NEEDS FOR PAIN MEDICATION AND PROPER MEDICAL TREATMENT.

19. PLAINTIFF SUBMITS WARDEN JOHNSON IS LIABLE,

BECAUSE AS WARDEN OF H.D.S.P., THIS WARDEN HAS FAILED, OR REFUSED TO ENSURE THAT PLAINTIFF HAS RECEIVED PROPER AND ADEQUATE MEDICAL TREATMENT AND PAIN MEDICATION WITHIN H.D.S.P. AND FURTHER SUPPORTS ADMINISTRATIVE REGULATIONS STATING H.D.S.P. INMATES CAN NOT GO TO OUTSIDE PROVIDERS WHO PROVIDE MEDICAL CARE WITHIN H.D.S.P. THE VERY FACILITY HE HAS AUTHORITY TO REGULATE AND OVERALL SUPERVISE.

20. PLAINTIFF SUBMITS DEFENDANT DANIELS IS LIABLE, BECAUSE HE HAS FAILED, OR REFUSED TO ENSURE PLAINTIFF HAS RECEIVED PROPER AND ADEQUATE MEDICAL TREATMENT AND PAIN MEDICATION; AND 'OUTSIDE' MEDICARE.

21. PLAINTIFF NEVER SIGNED A WAIVER OF ANY SORT; STATING THAT HE WAIVED ANY TREATMENT; OR THAT THE PRISON WOULD NOT BE LIABLE IF HE WERE PERFORMING HIS INMATE JOB DESCRIPTION AS A MEMBER OF THE HIGH DEBT STATE PRISON MAINTENANCE CREW; AND WAS INJURED WHILE ON THE JOB.

22. PLAINTIFF WAS INSTALLED UNDER THE BELIEF THAT IF HE WAS INJURED, OR INJURED HIMSELF; HE WOULD RECEIVE PROPER AND ADEQUATE MEDICAL TREATMENT; AND FOLLOW-UP CARE. AND THAT HAD PLAINTIFF BEEN INFORMED THAT HE WOULD NOT RECEIVE PROPER AND ADEQUATE MEDICAL CARE; HE WOULD HAVE CHOSE NOT TO WORK IN THE H.D.S.P. MAINTENANCE DEPARTMENT BECAUSE OF THE POSSIBILITY; REAL AND PERCEIVED THAT HE COULD; OR



OR MIGHT WELL, WOULD HAVE A CHANCE OF BEING INJURED AT SOME POINT.

23. PLAINTIFF SUBMITS ("ALLEGES") DR. WULFF AND DR. BRYAN KNEW; AS WELL AS D.O.N. FAULKNER; THAT THE HIGH DESERT STATE PRISON MEDICAL DEPARTMENT DID NOT/DOES NOT HAVE THE TYPE OF MEDICAL EQUIPMENT NEEDED AND NECESSARY TO PROPERLY AND ADEQUATELY ASSESS PLAINTIFF'S 'ABDOMENAL HERNIA' INJURY AND PRESCRIBE FURTHER TREATMENT. YET EACH OF THE DEFENDANTS IN THEIR OFFICIAL CAPACITY, FAILED, OR REFUSED TO ENSURE THAT PLAINTIFF BE GIVEN THE PROPER AND ADEQUATE CARE AND TREATMENT OF INJURY; BY REFERRAL TO AN OUT OF PRISON MEDICAL FACILITY.

24. THE MEDICAL DEFENDANTS: DR. WULFF, DR. BRYAN, AND DR. FAULKNER ACTED UNDER COLOR OF STATE LAW, INCLUDING BUT NOT LIMITED TO THOSE FURTHER PROVIDED FOR IN ADMINISTRATIVE REGULATION 600 (NRS 209.131 AND NRS 209.381), WHICH PROVIDES:

THE MEDICAL DIRECTOR IS RESPONSIBLE FOR THE FORMULATION OF HEALTH POLICY REGARDING THE HEALTH CARE DELIVERY SYSTEM, INCLUDING THE DEVELOPMENT AND MONITORING STANDARDS AND PROCEDURES FOR HEALTH CARE SERVICES FOR ALL INMATES CONFINED WITHIN THE FACILITIES AND HAS OVERALL RESPONSIBILITY FOR THE CLINICAL OPERATION OF THE MEDICAL DIVISION.

...

THE CHIEFS OF NURSING SERVICES ADMINISTER AND DIRECT THE ORGANIZED NURSING SERVICES OF MULTIPLE PRISON FACILITIES WITHIN THEIR GEOGRAPHIC AREA AND SUPERVISE THE INSTITUTIONAL DIRECTORS OF NURSING SERVICE.

THE INSTITUTIONAL DIRECTOR OF NURSING SERVICES (DON'S / D.O.N.'S) IS THE HEALTH CARE ADMINISTRATOR (HCA) AT THEIR RESPECTIVE INSTITUTION, THE HCA IS RESPONSIBLE FOR THE PROVISION OF HEALTH CARE SERVICES AT THAT INSTITUTION, ENSURING ALL INMATES HAVE UNIMPEDED ACCESS. ADDITIONALLY, THE DON'S AS HCA IS RESPONSIBLE FOR THE OVERALL ADMINISTRATIVE SUPERVISION OF ALL MEDICAL DIVISION EMPLOYEES AT THEIR INSTITUTION, TO INCLUDE PERSONNEL AND OPERATIONAL MATTERS.

25. THE MEDICAL DEFENDANTS: WULF, DR. ; BRYAN, DR. ; AND FAULKNER, D.O.N. ; KNEW, OR SHOULD HAVE KNOWN THAT THEIR CONDUCT, ATTITUDES AND ACTIONS; AND FAILURE TO ACT, CREATED AN UNREASONABLE RISK OF SERIOUS HARM TO PLAINTIFF; INCLUDING BUT NOT LIMITED TO THE ALLEGED "GROWTH IN SPREADER SIZE" OF PLAINTIFF'S HERNIA; AND THE MENTAL, PSYCHOLOGICAL, STRESSFUL AND FEARFUL CIRCUMSTANCES WHICH COMES WITH SUCH A 'GROWING' OR 'ORGANIC' INJURY.

26. AS A PROXIMATE RESULT OF THE MEDICAL MEDICAL DEFENDANT'S VIOLATIONS OF PLAINTIFF'S RIGHT TO BE FREE FROM 'CARELESS AND UNUSUAL PUNISHMENT', WHILE HE WAS HOUSED AT H.D.S.D.

PLAINTIFF HAS SUFFERED, AND WILL CONTINUE TO SUFFER IRREPARABLE HARM.

27. AS A DIRECT AND FORESEEABLE RESULT OF THE MEDICAL DEFENDANT(S): DR. WUFF, DR. BRYAN, AND D.O.N. FAULKNER'S VIOLATIONS OF THE EIGHTH AMENDMENT, PLAINTIFF HAS IN FACT SUFFERED; IS SUFFERING; AND WILL CONTINUE TO SUFFER PHYSICAL INJURIES FORM OF: LESS PHYSICAL ACTIVITY AND WORK; COMPLICATIONS WITH DOING #1 AND #2 IN THE BATHROOM; FATIGUE, SNEEZING, AND COUGHING; AS WELL AS OTHER LIMITATIONS ON PHYSICAL ACTIVITY; RESULTING IN ADDED PSYCHOLOGICAL AND MENTAL STRESS, ETC.

28. PLAINTIFF FURTHER STATES THE DEFENDANT(S): DR. WUFF; DR. BRYAN; AND D.O.N. FAULKNER; AS AFOREMENTIONED, DIRECTLY AND APPROXIMATELY CAUSED PLAINTIFF TO BE INJURED AND DAMAGED; AND THE 'ABDOMINAL HERNIA' INCREASED IN SIZE; AND CONTINUES TO INCREASE; BELIEVES HE IS ENTITLED TO AN AMOUNT, NOT YET FULLY ASCERTAINED, BUT IN EXCESS OF: ONE HUNDRED THOUSAND DOLLARS (\$100,000.00).

29. PLAINTIFF IS INFORMED AND BELIEVES THAT THE AFOREMENTIONED ACTS AND OMISSIONS OF DEFENDANTS, AND EACH OF THEM: DR. WUFF, DR. BRYAN, D.O.N. FAULKNER; AS SET FORTH HEREIN ABOVE AND BELOW, WERE WILLFUL, WANTON, MALICIOUS, INTENTIONAL, OPPRESSIVE, AND DESPICABLE; AND WERE DONE IN WILLFUL AND CONSCIOUS DISREGARD OF THE RIGHTS OF PLAINTIFF, THEREBY JUSTIFYING AN AWARD OF PUNITIVE AND/OR EXEMPLARY DAMAGES IN FAVOR OF PLAINTIFF AND

AGAINST DEFENDANTS IN AN AMOUNT IN EXCESS OF:  
ONE HUNDRED THOUSAND DOLLARS (\$100,000.00).

30. PLAINTIFF IS INFORMED AND BELIEVES THAT  
THE AFOREMENTIONED ACTS AND OMISSIONS OF  
DEFENDANTS: DIRECTOR DANIELS AND WARDEN JOHNSON;  
ARE THE RESULT OF THE NEVADA DEPARTMENT OF  
CORRECTIONS AND HIGH DESERT STATE PRISON'S USE,  
APPLICATION, OR POWER WITHIN: AR-740: A  
RENDERING THAT 'TREATMENT BY A CONTRACT  
PROVIDER IS NOT GRIEVABLE PER AR 740.' ETC.

31. PLAINTIFF FURTHER STATES THE DEFENDANTS  
HAVE USED AR 740 ; BOTH DEFENDANT DANIELS AND  
JOHNSON ; AS A MEANS TO LEAVE 'CONTRACT PROVIDERS'  
AS UNGRIEVABLE ENTITIES ; AND SEEK IT BE  
DECLARED THAT H.D.S.P. AND THE N.D.O.C. HAVE:  
USED AR 740 AGAINST MEDICAL GRIEVANCES  
FILED BY PLAINTIFF.

WHEREFORE:

BECAUSE DEFENDANT WULFF, BRYAN,  
FAULKNER, DANIEL, AND JOHNSON'S ACTS, FAILURES TO  
ACT, REFUSALS TO ACT VIOLATED THE EIGHTH AMEND-  
MENT OF THE UNITED STATES CONSTITUTION; RESULTED  
IN 'CRUEL AND UNUSUAL PUNISHMENT' AND 'DELIBERATE  
INDIFFERENCE TO SERIOUS MEDICAL NEEDS'; PLAINTIFF  
PRAYS FOR JUDGEMENT, AS SET FORTH IN THE  
PRAYER FOR RELIEF.

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**CLAIM 2**

The following civil rights have been violated: N/A

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

N/A

**CLAIM 3**

The following civil rights have been violated: N/A

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

N/A

- 9) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? Circle one: Yes or **(No)**. If your answer is "Yes," describe each lawsuit. (If more than one, describe the others on an additional page answering the following questions.)

- a) Defendants: N/A
- b) Name of court and docket number: N/A
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):  
N/A
- d) Issues raised: N/A  
N/A  
N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

- 10) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted? Circle one: Yes or **(No)**. If your answer is "Yes," describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page answering the following questions.)

**Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:**

- a) Defendants: N/A
- b) Name of court and case number: N/A
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A  
N/A  
N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

**Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:**

- a) Defendants: N/A
- b) Name of court and case number: N/A
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A  
N/A  
N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A

**Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:**

- a) Defendants: N/A
- b) Name of court and case number: N/A
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A  
N/A  
N/A
- e) Approximate date it was filed: N/A
- f) Approximate date of disposition: N/A



**D. REQUEST FOR RELIEF**

I believe I am entitled to the following relief: \_\_\_\_\_

PUNITIVE DAMAGES in the amount of; AND upon proper  
ASSESSMENT IN EXCESS OF: (\$100,000.00 - );  
COMPENSATORY DAMAGES in amount of; AND upon proper  
ASSESSMENT IN EXCESS OF: (\$100,000.00-); AND  
DECLARATORY DAMAGE: A DETERMINATION THAT H.D.S.A. AND  
THE N.D.O.C. ARE IN USE OF AR 740 AGAINST GRIEVANCE PROCESS.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. I **DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

"THE WEST WINTER"  
(name of person who prepared or helped  
prepare this complaint if not the plaintiff)

Paul Scott Nelson  
(signature of plaintiff)

11-30-20  
(date)

Paul Scott Nelson #82571  
HOSP  
PO Box 650  
Indian Springs, NV

FILED  
ENTERED  
DEC - 9 2020  
CLERK US DISTRICT COURT  
DISTRICT OF NEVADA  
BY: \_\_\_\_\_

8910187069 COT5

LA Vegas 59101  
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RV 1334

